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WARD

PARTNERS

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

DEVI RAJSHRI SETHUMADHAVA MENON

Plaintiff,

Docket No. 2:21-cv-08384

- against -

CORBETT AND CATALYST

CERTIFICATION OF DEVI RAJSHRI SETHUMADHAVA MENON IN SUPPORT OF THE APPLICATION FOR DEFAULT JUDGMENT

	Defendant.
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Pursuant to 28 U.S.C. § 1746, I, , Devi Rajshri Sethumadhava Menon, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

- 1. I am the Plaintiff in this action and make this certification in support of my application for the alternative service upon Ward Corbett.
- 2. As detailed in the complaint, I was defrauded by Mr. Corbett when I was in a romantic relationship with him. When we met, it was always in my home, and not his. I understood at the time that he lived in New York City, but now I have no idea if that, or anything else he ever told me, was true.
- 3. The email addresses used by Mr. Corbett when we were dating were ward.corbett@gmail.com, ward.corbett@yahoo.com and ward.corbett@yahoo.com and ward.corbett@yahoo.com and

- time he actively used these accounts, as I would email with him. I do not know if he still uses these accounts, though I believe the Facebook records indicate that his gmail.com address is the email address of record on his active Facebook account. I believe that these email addresses would apprise Mr. Corbett of the lawsuit against him.
- 4. Mr. Corbett was an active user of Whatsapp and we communicated at length via that platform when we were dating. The phone number we used for Mr. Corbett was 646-824-9273 and I have no reason to believe that the number is no longer active. As of this date, the Whatsapp app lists Mr. Corbett as available and shows his photo in the profile listing. Furthermore, Whatsapp provides delivery receipts to know that the message was in fact delivered to the recipient.
- 5. Similarly, the Facebook account for Mr. Corbett is an active account. It is his photo in the account and on numerous postings. As detailed in the declaration of my attorney the Facebook records match Mr. Corbett's phone number and email address that I have provided and used previously. There is no doubt that this account is Mr. Corbett's.
- 6. Furthermore, the Facebook account is active. As of December 30, 2022, Mr. Corbett was actively posting on Facebook. Annexed hereto as Exhibit A is a true copy of the Defendant's Facebook Page printed today. Furthermore, Facebook Messenger also provides receipts for delivery.
- 7. Mr. Corbett has evaded service at every step of the way. While the Court is rightfully concerned that he be notified of the action, it simply is not reasonable to allow him to continue to evade service with no compunction. Notices have been left at his office, with now deceased mother, and by mail to every claimed office his company had. We are

- proposing a reasonable method to ensure that Mr. Corbett is in fact notified of the lawsuit so that he can either defend himself or so that we can proceed to obtaining a judgment.
- 8. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on March 24, 2023.

Devi Rajshri Sethumadhava Menon

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03/24/2023.